

Engineers and Constructors

ALASKA OPERATIONS

Contract No. DACA85-95D-0018

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Project: Annette Island

DC#AKT-J07-05M314-G01-0024

Confirmation of:	<input checked="" type="checkbox"/> Conference	Date Held: 15 Sep 99 8:00 am (Alaska)
	<input type="checkbox"/> Teleconference	Date Issued: 24 Sep 99
	<input type="checkbox"/> Other:	Recorded By: Lyn Dokoozian
		Place: Metlakatla, Alaska
Subject: MOU Work Group Meeting		

Participant	Organization	Phone
Askren, Rachael	Metlakatla Indian Community (MIC) Council	907-886-6601
Benediktsson, Cathy	Federal Aviation Administration (FAA)	907-271-5373
Benson, Jeff	Metlakatla Indian Community (MIC) Environmental	907-886-4200
Beyette, Garth	Federal Aviation Administration (FAA)	907-271-3355
Deering, Bob	U.S. Coast Guard (USCG)	907-463-2440
Dokoozian, Lyn	Jacobs Engineering Group Inc.	907-563-3322
Elconin, Andrea	U.S. Army Engineer District-Alaska (USAED)	907-753-5680
Hanneman, Dave	U.S. Army Engineer District-Alaska (USAED)	907-753-5209
Holloway, Tom	Federal Aviation Administration (FAA)	202-267-8114
Jean, Lucy	Federal Aviation Administration/Reliance (FAA)	907-271-5225
Lauth, Judith	Metlakatla Indian Community (MIC) Council	907-886-4441
Renk, Russ	Federal Aviation Administration (FAA)	907-271-3294

MEETING MINUTES

Action Required By	Item
	<p>This was the monthly MOU Work Group Meeting at Annette Island. The following agenda was proposed:</p> <ol style="list-style-type: none"> 1. Roll Call 2. General Information 3. USCG MSD Presentation re Pipeline Removal 4. Action Items Update 5. New Action Items/Issues 6. Schedules 7. C-3 Plan Revision

		<p>8. Newsletter</p> <p>9. Teleconference Schedule and next MOU Work Group Meeting</p> <p>10. Closure</p>
	<p>2.0</p> <p>2.1</p> <p>2.2</p> <p>2.3</p>	<p>General Information</p> <p><u>BIA</u></p> <p>Not present at this conference.</p> <p><u>FAA</u></p> <p>Tom Holloway and Cathy Benediktsson are on site to review the FAA sites and observe work progress. Following a site walk, Holloway related several concerns:</p> <ol style="list-style-type: none"> 1. Safety and health of the community and the people doing the cleanup work. 2. The magnitude of work that needs to be done. 3. The difficulty of site access and debris removal. 4. Disturbance to the area during cleanup. 5. Cleanup levels. 6. Coordination of efforts to provide efficient and effective cleanup. <p><u>MIC</u></p> <p><u>EPA Issues</u></p> <p>Benson recounted MIC's priorities, as recently passed by the council: human health, environment, and training and employment so MIC can conduct the ongoing cleanup process.</p> <p>In response to Benediktsson's inquiry, Benson stated that MIC does not want Annette Island to be designated an NPL site and, hence, a Superfund site because such a designation could affect tourism and cannery sales. In addition, limited funding is available for NPL sites. Benson and EPA representatives discussed this issue in a teleconference on 14 Sep 99.</p> <p>EPA is considering naming MIC as its point of contact on Annette Island. EPA Region 10 is drafting a decision letter which will include all EPA Region 10 departments (solid waste, USTs, etc.) and establish a cooperative agreement between MIC and EPA.</p>

		<p>MIC confers with EPA offices in Seattle and Washington D.C. The Seattle office (Region 10) has signature authority, and most EPA grants originate in Seattle; solid waste grants originate in Washington D.C., and small general assistance grants for capacity development originate in Anchorage. Benediktsson requested additional information regarding MIC's needs so she can present them during FAA's discussions with EPA.</p> <p>Renk requested consistency in regulations and policy; for example, different goals have been established for water quality than for contaminated site cleanup, for USTs than for ASTs. Benson said MIC established these cleanup levels to provide consistency and that every number in MIC's cleanup policy came from a federal or state agency. Benson has requested that EPA prepare a letter explaining the source of the numbers. A need still exists for a single point of contact (SPOC) to review the numbers issued by EPA.</p> <p><u>Other Activities</u></p> <p>MIC and BIA designated a storage area for non-hazardous, historically-significant material collected at Annette Island. Per SHPO regulations, USAED will offer these items to the community and area museums. Benson drafted a policy letter to "all interested parties" stating MIC will accept non-hazardous, historically-significant material and will submit it to the MOU Work Group.</p> <p>Benson noted that GTE is almost finished with the troposphere removal work but still has to dispose of the PCB-contaminated water. GTE sampled extensively and will submit analyses to MIC when complete, and then request closure. Soil was removed and will be shipped off the island.</p> <p>The BIA tank pull site work is almost finished. BIA will request site closure from MIC and EPA.</p>
2.4	<u>USAED</u>	<p>USAED completed the drum removal activities, except for waste removal. Elconin and Beyette will discuss the drum decontamination area in a separate meeting. Benson stated that MIC's guidelines specify that drums be cut in half because recyclers in the region will not buy the drums if they are not cut. Drums cut in half are treated as scrap metal; whole drums are considered hazardous material. Beyette noted that cutting drums will reveal contents; however, if drums are crushed, that may not be possible.</p> <p>Elconin said the wastewater produced during work activities was treated and will be discharged to the sewer system, per Benson's request.</p>

<p>MIC MIC USAED/ MIC</p>	<p>2.5</p>	<p>Elconin and Benson are drafting a cooperative agreement for NALEMP funding. The agreement must be completed by 30 Sep 99. The funds, available for 15 months or until 31 Dec 00, would be used for hiring MIC personnel and consultants.</p> <p><u>USCG</u></p> <p>CH2M Hill submitted its proposal for the preliminary assessment. The contract will be awarded by 24 Sep 99.</p> <p>Deering distributed aerial photographs and drawings of Annette Island activities. An additional 50 photographs are available for viewing at the Juneau USCG office. Many photographs have been scanned and will be posted on the web site.</p> <p>Action:</p> <p>Askren...Prepare a response regarding the airport towers.</p> <p>Benson...Submit letter to the MOU Work Group stating MIC will accept non-hazardous, historically-significant material.</p> <p>Elconin/Benson...Draft a cooperative agreement for NALEMP funding.</p>
	<p>3.0</p>	<p>USCG MSD Presentation re Pipeline Removal</p> <p>The scheduled presenter did not attend the meeting.</p>
	<p>4.0 4.1 4.2 4.3</p>	<p>Action Items Update (reference 31 Aug 99 list)</p> <p><u>BIA</u></p> <p>Not present at this conference.</p> <p><u>FAA</u></p> <p>Item 5...FAA is scheduled to meet with EPA on 16 Sep 99 regarding designation of SPOC.</p> <p><u>MIC</u></p> <p>Item 14...Completed. Benson noted an error in "MIC Guidelines for Cleanup and Remediation of Open Dumps and Other Contaminated Sites." The residential cleanup levels should be 250 mg/kg for lead, not 200 mg/kg.</p> <p>Item 15...Mayor Gilmartin will issue a letter on 16 Sep 99 providing permission to collect samples from the beach area.</p>

MIC	4.4	<u>MOU Work Group</u> Item 17...Hanneman (USAED) is responsible for producing a draft MOU QAPP by 1 Jan 00.
	4.5	<u>USAED</u> Item 22...Completed. Benson coordinated with BIA; MIC will accept non-hazardous, historically significant material.
	4.6	<u>USCG</u> Refer to Section 6.5. Action: Benson...Submit letter to MOU Work Group stating MIC will accept historically significant, non-hazardous materials.
	5.0	New Action Items/Issues
	5.1	<u>Kodiak Soil Management Plan</u> Deering summarized the history of the Kodiak Soil Management Plan. Kodiak Island is one of USCG's largest facilities with several USCG entities involved and many contaminated soil issues to address. Each cleanup activity generated contaminated soils which were stockpiled but not cleaned. USCG developed a Standard Operating Procedure to address this issue, sampling procedures, record keeping, stockpiling requirements, and soil cleanup responsibilities. Deering thought the Kodiak plan could be used as a model for soil management at Annette Island to maintain proper records on the multiple stockpiles of soil so owners and regulators know the types and levels of contamination. Deering identified two key requirements for soil management: one agency must be responsible for maintaining records and one for managing the stockpile. Beyette said the plan has valuable information that can be applied to Annette Island and other cleanup areas. Deering said the plan is available for use by any agency; however, some cleanup standards have been revised by regulating agencies. The group discussed how the plan could be applied to the Annette Island project. Each agency needs to keep records, but all need to coordinate with Benson regarding stockpile locations and disposition. Some soil could be remediated at Annette Island, but other soils—such as those containing heavy metals—may need to be transported to an appropriate facility.

		<p>Deering will collect and forward soil management information to Snell to be posted on the web site. Deering predicted that gathering this information may take until 1 Jan 00.</p>
	5.2	<p><u>Revised Sample C-3 Plan Backup Format</u></p> <p>The revised "C-3 Plan Backup Data Form" was distributed. The plan is to complete one form for each cleanup site and include it in the C-3 Plan. Beyette suggested adding a line at the top of the form for "Primary Lead Agency" and "Point of Contact." Regarding the "Site Closed, Yes or No" section, he noted that the group must agree upon the definition of a closed site.</p> <p>The group discussed "Regulatory Issues" and agreed these (i.e., RCRA, TSCA or CERCLA waste issues) could be the justification for taking action. The group agreed to change the title to "Regulatory Justification."</p> <p>The following change was made to the "Stakeholders" section: "...where hazardous wastes/materials/substances have been released, stored, treated, or disposed of." The table will be used to record historical information regarding 'who did what' at the site.</p> <p>Beyette suggested moving "Site History" above "Stakeholders."</p> <p>FAA will revise the data form and distribute it electronically by 24 Sept 99.</p>
	5.3	<p><u>Electronic Data Deliverables</u></p> <p>Hanneman said USAED uses electronic data format (EDF) and receives laboratory data in EDF and hard copy. USAED can manipulate the EDF data in Microsoft Excel. USAED is working with a consulting firm to manage the data using Data Stream software. Hanneman distributed "Table 1, Whole Barracks Renewal, Fort Richardson" which illustrates data compiled in EDF and converted by Data Stream. This program is flexible and useful for comparing various data. Hanneman stated that the additional cost, if any, of EDF data versus standard reports is minimal because all labs are now using this technology. Data Stream is the basic minimum software, and Hanneman encouraged all agencies to purchase and use it.</p> <p>Hanneman distributed "EDMS Software Cheat Sheet" which describes the capabilities of the EDMS database system. EDF contains analytical data only. EDMF includes EDF plus coordinates and other GIS information.</p> <p>Jacobs uses EDMS for TERC projects. Dokoozian described its efficiency and how easy it is to use from the field. Dokoozian will provide Deering with a contact regarding Data Stream. [Note: the contact is Marilyn Arsenault, 907-346-3827.]</p>

	5.4	<p><u>Common QAPP</u></p> <p>The group agreed upon the need for a common Quality Assurance Project Plan (QAPP) and discussed those already in existence. USAED's standard QAPP is not current, but they have certified laboratories. USAED has a standard sampling plan, but it is more stringent than required for this project. A standard QAPP developed by ADEC and EPA is for petroleum only.</p> <p>While each agency may have different data quality objectives (DQOs), which complicates the issue, the group needs to develop a minimum QAPP for site-specific work on Annette Island. The group decided to combine the various documents to create the "MOU QAPP." Hanneman will prepare and submit a draft MOU QAPP for review by 1 Jan 00.</p>
	5.5	<p><u>Closeout Requirements</u></p> <p>Deering said USCG is unwilling to begin cleanup activities until an end-point has been established because some requirements may not be attainable. He asked Benson how MIC would respond if cleanup was completed but residual contamination remained with no way to remove it. Benson is the POC for waivers from MIC cleanup levels and agreed to confer with the council regarding this issue. The group must receive closeout approval for each site or issue within a site so the work does not continue indefinitely.</p> <p>Variances are addressed in Section 6.3 of the MIC Guidelines for Cleanup and Remediation. A request for a variance must be submitted in writing to MIC.</p> <p>Beyette said BIA needs a more active role because they govern the land and have a responsibility to ensure the area remains in good condition. Due to co-contamination, each agency must have a voice and be able to sign off on a site. Holloway will meet with Terry Verden (BIA, Washington D.C.) and Ed Wandelt (USCG) to discuss BIA representation at the MOU Work Group meetings.</p>
	5.6	<p><u>GIS Requirements</u></p> <p>A geographical information system (GIS) is used to track surveying information, record forestry and land use management, plot sample locations and results, and perform other various applications.</p> <p>Hanneman distributed "Needs Assessment Survey for an Environmental GIS at Annette Island." He requested that each agency complete this form before a GIS can be established; the agencies must define expectations and describe the intended use. The group must plan its overall needs before a system can be properly designed.</p>

		<p>Regan Sarwas (USAED) will compile information from the questionnaires and develop a project-specific GIS. Hanneman will help define the needs of the agencies. Sarwas' activities are currently funded; however, agencies would need to provide funding in the future for GIS for this project.</p> <p>Elconin envisioned a map of Annette Island indicating all features, buildings, and sample locations. Benson requested that because GIS is developed by USAED for the peninsula, it also have the capacity to be expanded to include the entire island so other MIC data can be included.</p> <p>Each agency in the MOU Work Group will complete and return the "Needs Assessment Survey" to Sarwas by 7 Oct 99. Dokoozian will distribute the survey with the minutes from this meeting. Sarwas will be invited to the 17 Nov 99 MOU Work Group meeting.</p>
	5.7	<p><u>Community Relations</u></p> <p>USAED distributed draft "Community Involvement Plan" (CIP, Sep 99) and a draft letter inviting Annette Island residents to participate in a community interview. Currently written for USAED activities only, the plan describes USAED's community relations activities. A community relations plan is required for FUDS projects. The group reviewed the plan. Elconin offered to include information in the plan for the MOU Work Group.</p> <p>Benediktsson suggested that the Introduction include more than historic military uses since World War II. Dokoozian said that when received, other agency information would be added.</p> <p>Benson recounted that MIC's attempts at public outreach resulted in limited participation. Ridolfi conducted numerous recorded interviews for MIC, but the tapes were never transcribed. Benson will provide a questionnaire used previously, background material for previous activities, and the recorded interview tapes. Elconin said those previous questionnaires and interviews should be evaluated before new interviews are conducted.</p> <p>The group agreed to adopt the CIP as an MOU Work Group document. Jacobs will revise the plan accordingly. Elconin asked the group to postpone review of the plan and revision of the questionnaire until she and Dokoozian have reviewed Benson's material.</p>

	5.8	<p><u>Streamlined Action Item List</u></p> <p>To make the action list more useful, the group agreed to divide it into two lists. The “Interagency Action List” will contain critical issues requiring immediate action and warranting discussion. The “Ongoing Action List” will contain items that do not need to be discussed at every meeting. These items will have due dates; when the date nears, the item will be moved to the first list. Select issues (such as the common QAPP and community relations) will be added to the teleconference agendas for discussion.</p>
	5.9	<p><u>Website Update</u></p> <p>The group agreed that articles submitted to Benson for the Metlakatla newsletter will also be sent to Snell for the web site.</p>
	5.10	<p><u>USAED Decontamination Pad</u></p> <p>Beyette added this topic to the agenda. The decontamination pad has been constructed. Jacobs was scheduled to demolish the pad at the end of this field season; however, FAA and MIC have expressed an interest in using it. The pad is covered for protection. USAED will remove the connexes and Porta-Potties.</p> <p>The group discussed liability issues and agreed to the following:</p> <ol style="list-style-type: none">1. USAED will document the condition of the pad and the analytical results of composite soil samples taken before the pad was constructed.2. FAA will use the pad this fall, then secure it with the cover and rocks for the winter.3. MIC may check the pad regularly during the winter and make minor repairs as necessary. If major repairs are needed, MIC will contact USAED.4. USAED will instruct South Coast to make major repairs as necessary during the winter.5. MIC will take possession of the pad next summer. If not, the group will re-evaluate the status or USAED may demolish it. If contamination is an issue at the time of demolition, liability and cleanup costs will be shared by the users. <p>The group discussed the tanks USAED purchased to hold decontamination water—one 5000-gallon tank and two 325-gallon tanks. FAA wants to use the tanks, so USAED will leave them onsite.</p> <p>Dokoozian will provide FAA with photographs, as-builts, and a condition report of the decontamination pad and analytical results of the water in the tanks.</p>

USCG		Action: Deering...Collect and forward soil management information to Snell to be posted on the web site.
FAA		Jean...Revise and distribute the C-3 Plan Backup Data Form by 24 Sep 99.
USAED		Dokoozian...Provide Deering with information regarding Data Stream contact.
USAED		Hanneman...Prepare and submit a draft MOU QAPP for review by 1 Jan 00.
FAA		Holloway...Discuss BIA representation with Verden (BIA) and Wandelt (USCG).
USAED		Dokoozian...Distribute the "Needs Assessment Survey" with the meeting minutes by 24 Sep 99.
MOU Work Group		All...Complete and return the "Needs Assessment Survey" to Sarwas by 7 Oct 99.
MIC		Benson...Forward public outreach material to Elconin and Dokoozian.
USAED		Elconin/Dokoozian...Review public outreach questionnaires and recorded interviews; revise the Community Involvement Plan to represent the MOU Work Group.
USAED		Dokoozian...Provide FAA with photographs, as-builts, and a condition report of the decontamination pad and analytical results of the water in the tanks.
	6.0	Schedules
	6.1	<u>BIA</u> BIA is nearly finished with their tank removals (two underground asphalt tanks), and has requested closure from MIC and EPA.
	6.2	<u>FAA</u> FAA awarded the brush clearing contract to MIC last week. Work will begin on 20 Sep 99. FAA is preparing the building removal contract. The tank work will begin on 20 Sep 99, and the release investigation work will begin in two weeks.
	6.3	<u>MIC</u> LP is working on the golf course site.

	6.4	<p><u>USAED</u></p> <p>Elconin said the drum removal work is finished. Waste staged at the quarry will be shipped off the island by 30 Sep 99. Ten rolloffs containing crushed drums and asphalt will be shipped by 21 Sep 99.</p>
	6.5	<p><u>USCG</u></p> <p>By 24 Sep 99, CH2M Hill will be awarded a contract to perform preliminary assessments of 13 USCG sites during Oct and Nov 99. CH2M Hill is also doing work for FAA.</p> <p>Action: None.</p>
	7.0	<p>C-3 Plan Revision</p> <p>See Section 5.2; no additional discussion.</p> <p>Action: None.</p>
	8.0	<p>Newsletter Articles</p> <p>MOU Work Group will submit newsletter articles to Benson (copy to Snell) by 24 Sep 99.</p> <p>Action: None.</p>
Jacobs	9.0	<p>Teleconference Schedule and Next MOU Work Group Meeting</p> <p>The next teleconference is scheduled for 28 Sep 99 at 1:30 pm (Alaska). Subsequent teleconferences are scheduled for 12 Oct 99 and 26 Oct 99.</p> <p>The next MOU Work Group Meeting is scheduled for 17-18 Nov 99 at Anchorage.</p> <p>Action: E-mail the agenda to participants on 24 Sep 99.</p>

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ENGINEERING GROUP INC.

Project Note

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	10.0	Closure Elconin and the rest of the MOU Work Group thanked Benson for his hard work and efforts in assisting USAED and others during this field season.
		Conference adjourned at 4:40 pm (Alaska).